

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Antoine Land and Parfait Moukiam,
Individually, and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

Frontline Communications, Inc., Gina Urso,
John Urso, Comcast Corporation and Comcast
Cable Communications Management LLC,

Defendants.

Case No. 1:10-CV-7640

Hon. Joan H. Lefkow

**DEFENDANTS COMCAST CORPORATION'S AND COMCAST CABLE
COMMUNICATIONS MANAGEMENT LLC'S
UNOPPOSED MOTION TO ANSWER OR OTHERWISE PLEAD**

Defendants, Comcast Corporation and Comcast Cable Communications Management LLC (collectively, "Comcast"), by their attorneys, hereby move for an extension of time to answer plaintiffs' First Amended Complaint or otherwise plead in response to plaintiffs' First Amended Complaint. In support of its Motion, Comcast states as follows:

1. On or about October 20, 2010, plaintiff Antoine Land ("Land") filed a Complaint against Defendants in the Circuit Court of Cook County, Illinois, Case No. 2010 CH 45640 (the "Complaint"). On or about November 19, 2010, Comcast accepted service of process of the Complaint.

2. On December 1, 2010, Defendants Frontline Communications, Inc. and Gina Urso removed the Complaint to this Court on the basis of federal question jurisdiction.

3. Comcast subsequently moved for – and was granted – an extension of time to move or otherwise plead in response to Land's Complaint. (Docket Nos. 14 and 16). On January 7, 2011, Comcast filed a motion to dismiss the Complaint.

4. On July 25, 2011, Land and Comcast came to an agreement in principle on the terms of settlement of this lawsuit.

5. On September 19, 2011, plaintiffs filed their First Amended Complaint (Docket No. 43), making Comcast's responsive pleading due on October 10, 2011.

6. During a status hearing held on September 29, 2011, counsel for plaintiffs and Comcast reported to the Court that the parties were working to finalize the written settlement agreement and related documents. Due to the anticipated filing of a motion for preliminary approval of settlement, during the hearing, counsel for Comcast made an oral motion for an extension of thirty (30) days to answer or otherwise plead in response to plaintiffs' First Amended Complaint. The Court granted Comcast's oral motion and set Comcast's responsive pleading deadline at November 10, 2011. (Docket No. 45).

7. The parties are close to resolving the few outstanding issues related to the written settlement agreement and related documents, and anticipate filing a motion for preliminary approval of the settlement within 30 days. Accordingly, Comcast requests an additional thirty (30) days, or until December 12, 2011, to answer or otherwise plead in response to plaintiffs' First Amended Complaint.

8. On November 7, 2011, counsel for Comcast, Stephanie Sweitzer, conferred with plaintiffs' counsel and requested their agreement to an extension of time to respond to the First Amended Complaint. Plaintiffs' counsel consented to the request for an extension.

WHEREFORE, for the reasons set forth above, Comcast Corporation and Comcast Cable Communications Management LLC respectfully request that this Court grant their motion and extend the time for Comcast to answer or otherwise plead in response to plaintiffs' First Amended Complaint to December 12, 2011.

COMCAST CORPORATION AND
COMCAST CABLE COMMUNICATIONS
MANAGEMENT, LLC

By: /s/ Stephanie L. Sweitzer
One of Their Attorneys

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Dated: November 7, 2011

CERTIFICATE OF SERVICE

The undersigned hereby certifies the foregoing Defendants Comcast Corporation's And Comcast Cable Communications Management LLC's Unopposed Motion to Answer or Otherwise Plead was filed on November 7, 2011 with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

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